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September 10, 2001

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

Re: Bell Atlantic Corp. and GTE Corp., CC Docket No. 98-184

Dear Ms. Salas:

Today, J. Canny, S. Guerard, M.J. Howe, L. Vial and I met with C. Matthey, K. Moran, M. Stone and A. Dale to discuss the enclosed. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Dee May".

Enclosure

cc: A. Dale
K. Moran
C. Matthey
M. Stone

Verizon Performance Measurements and Standards

Flow Through

September 10, 2001

Flow Through Proposal

- Linked to Performance on Order Confirmation for Manual Orders
- Different metrics selected East & West
 - East - Total Flow Through
 - West - Achieved Flow Through
- Disaggregation of UNE
 - UNE Platform
 - UNE Loop
- Separate standards by state

Linked to Performance on Order Confirmation for Manual Orders

- Why?
 - If an order does not flow through Verizon must manually handle the order.
 - It is expensive to manually handle orders
 - Verizon is incented to reduce the cost of handling orders manually
 - No impact on provisioning performance

Different metrics selected

East & West

- Why? The markets are different.
 - East
 - Mature market with many CLECs purchasing a variety of products
 - More urban than rural
 - Significant volume
 - Predictable
 - West
 - Immature market with few CLECs purchasing primarily resale
 - Significant rural exchanges
 - Minimal CLEC activity.
 - Unpredictable & volatile

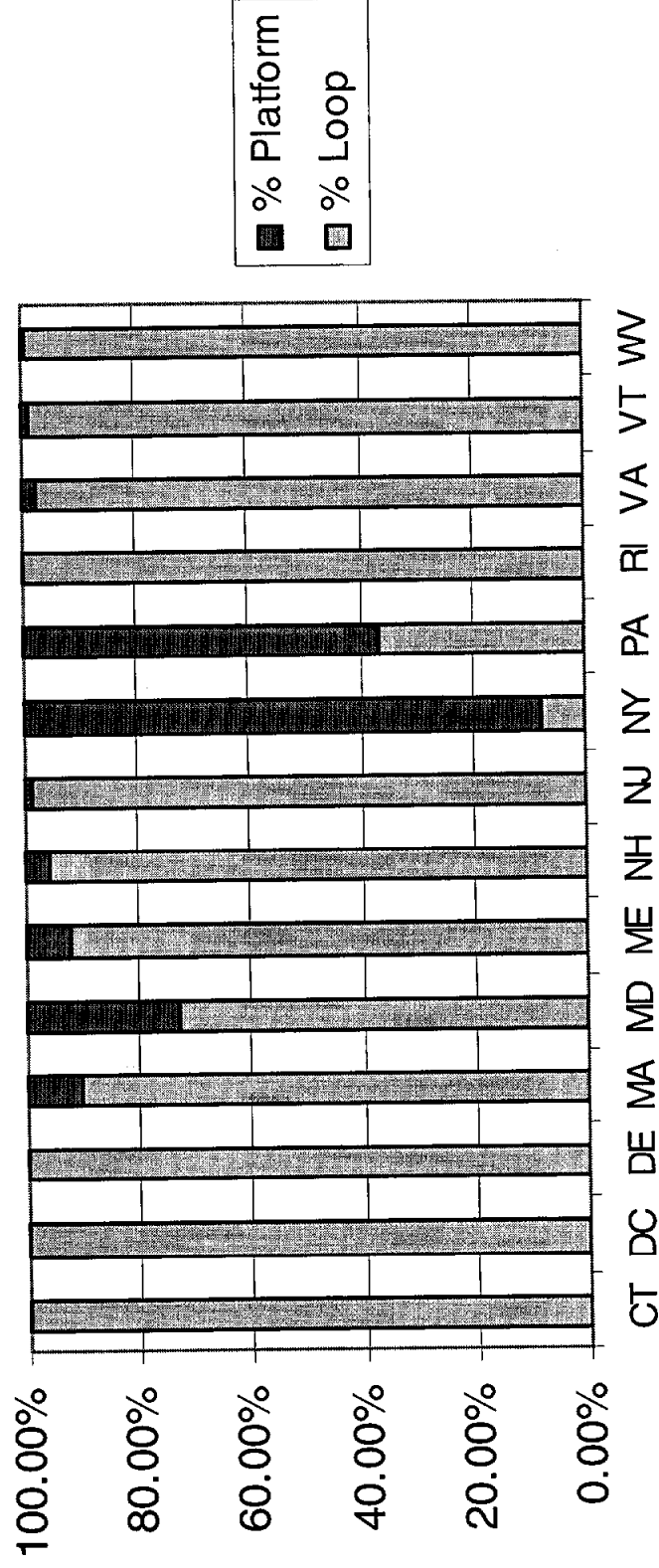
Disaggregation of UNE

- Why? Markets are different.
 - NY 90% Platform & 10% Loop. NH is the reverse. Some states have no platform at all.
 - Platform is more analogous to a retail service and flows through like retail
 - Loop is far more complicated and unlike any retail product. Manual processing is required for some products. (Facility checks, coordinated conversions, manual loop qualification)
 - Provisioning intervals are longer for loops (I.e., 5 days for hot cuts)

Loop Vs. Platform %

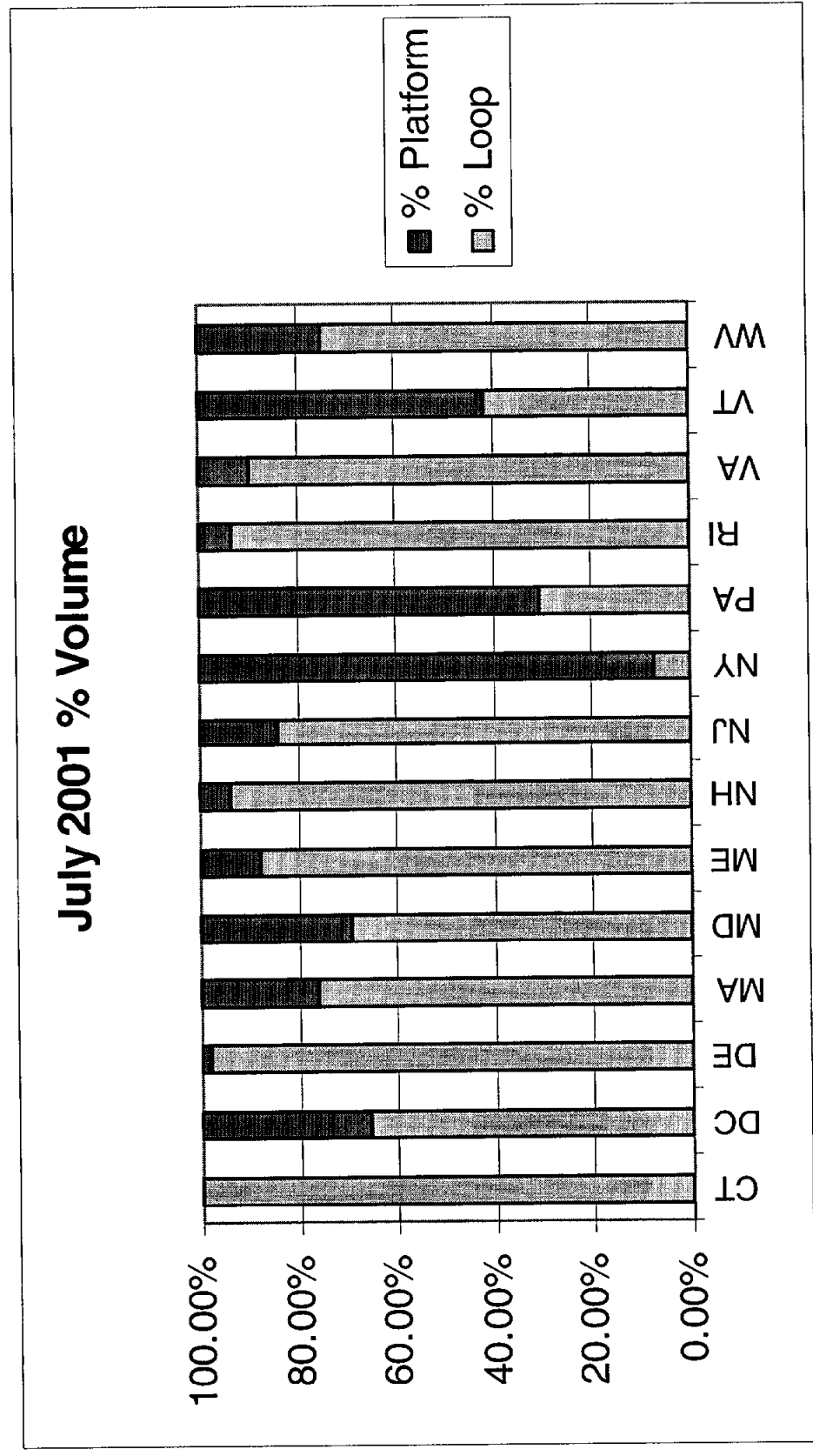
East - November 2000

November 2000 % Volume



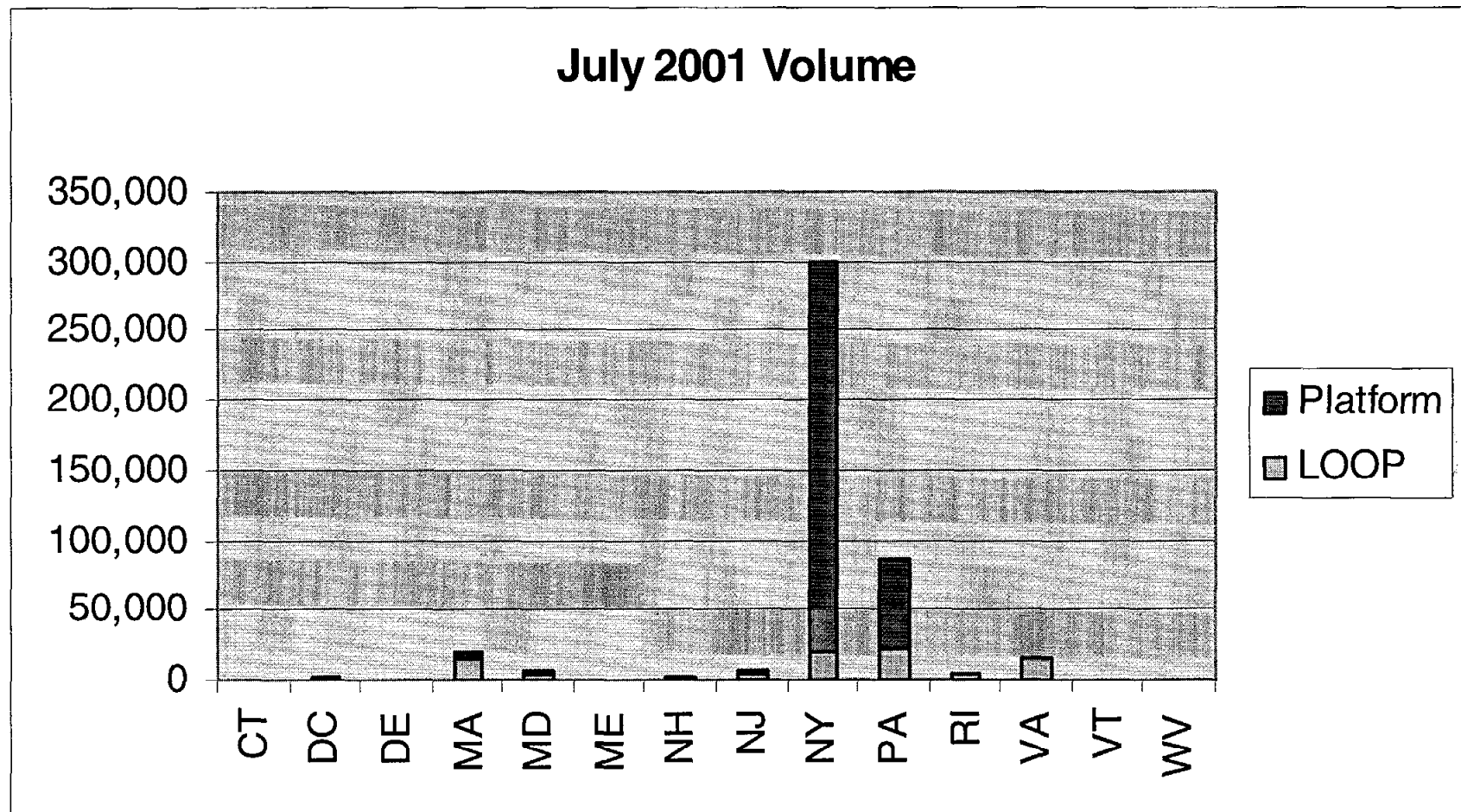
Loop Vs. Platform %

East - July 2001



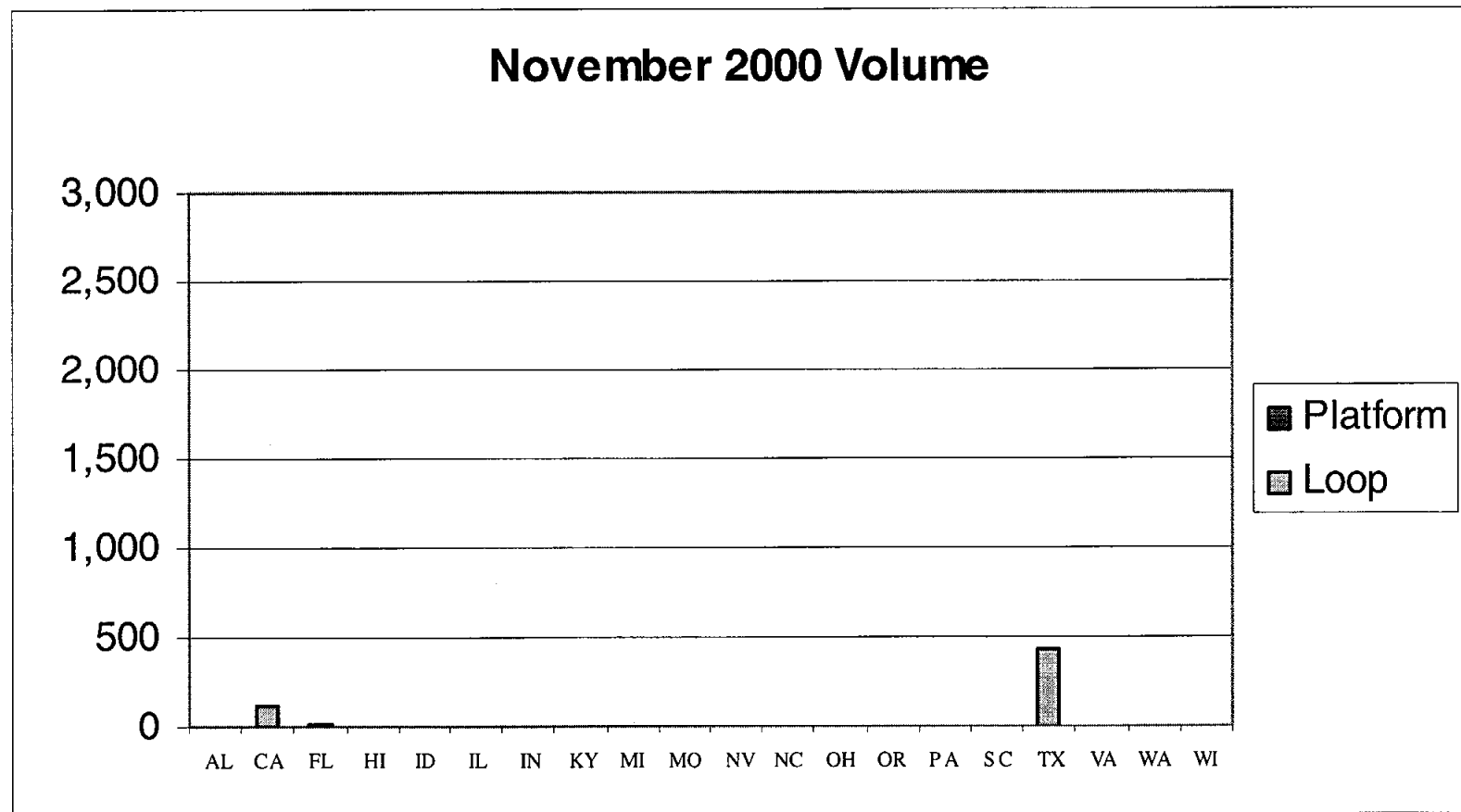
Loop Vs. Platform Volume

East - July 2001



Loop Vs. Platform Volume

West - November 2000



Loop Vs. Platform Volume

West - July 2001

